

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
IN CLERK'S OFFICE

2006 MAY 31 A 10:30

UNITED STATES OF AMERICA,

V.

JOSEPH SULLIVAN, ET AL.

Defendants

CRIM. NO. 04-30046-MAP

U.S. DISTRICT COURT  
DISTRICT OF MASS.

MAY 30, 2006

**DEFENDANT JOSEPH SULLIVAN'S MOTION TO ENLARGE TIME FOR FILING**  
**MOTION RE: APPROPRIATE METHOD OF CALCULATING LOSS**

NOW comes Joseph Sullivan, defendant herein, and respectfully requests that the time for filing his motion regarding the loss calculation for purpose of his sentencing, be enlarged to July 28, 2006. The following grounds support this request:

1. Defendant Sullivan's sentencing is scheduled for October 11, 2006. It appears to be the first sentencing of all defendants in the above-referenced case.
2. The additional time is necessary so that a full accounting of the alleged loss amount can be made by the defendant's expert.
3. The additional time is also necessary so that counsel for Mr. Sullivan and counsel for the other defendants may confer with one another regarding the loss calculation to determine whether they can provide the Court with the methodology underlying the calculation that is acceptable to all of the parties. This should significantly narrow, if not eliminate, unnecessary issues.
4. Undersigned counsel has communicated with counsel for the following defendants, all of

whom concur in counsel's request for enlargement of time: Albert Innarelli (James Bergenn and Moira Buckley); Wilfred Changasie (Terry Nagel); Lawrence Lynch (Kevin Murphy); Pasquale Romeo (Michael Jennings); Michael Bergdoll (Steven Leary); and Theodore Jarrett (William Kettlewell). Counsel is in the process of ascertaining the positions of the remaining defendants.

Wherefore the defendant respectfully requests that the above-described relief be granted.

DATED: May 30, 2006

**DEFENDANT,**

**JOSEPH SULLIVAN**

By His Attorney,

A handwritten signature in black ink, appearing to read 'Thomas Kokonowski', is written over a horizontal line.

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**CERTIFICATE OF SERVICE**

I, Thomas Kokonowski, do hereby certify that I have served a copy of the foregoing motion on the following parties electronically and via mail, and have filed the foregoing electronically on this 30<sup>th</sup> day of May, 2006.

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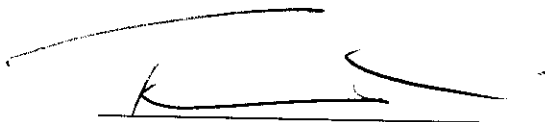
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